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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
In re : Chapter 11  
:  
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
:  
Debtors<sup>1</sup>. : (Jointly Administered)  
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**THIRTIETH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC  
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF  
MARCH 1, 2022 THROUGH AND INCLUDING MARCH 31, 2022**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	March 1, 2022 – March 31, 2022
Total Amount of Fees Incurred:	\$93,608.00
Total Fees Requested (80%):	\$74,886.40
Total Reimbursement of Expenses Incurred:	\$1,129.95
Total Reimbursement of Expenses Requested (100%):	\$1,129.95
Total compensation and Reimbursement Requested in this Statement:	\$76,016.35
This is Applicant's:	Thirtieth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated December 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Thirtieth Monthly Fee Statement (the "Fee Statement") for the period of March 1, 2022 through and including March 31, 2022 (the "Statement Period").

**Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$93,608.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$74,886.40.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,220.30<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$345.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$1,220.30 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

#### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$74,886.40, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

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<sup>2</sup> The blended hourly billing rate of \$1,220.30 is derived by dividing the total fees for attorneys of \$92,987.00 by the total hours of 76.2.

<sup>3</sup> The Blended hourly billing rate of \$345.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$621.00 by the total hours of 1.8.

connection with such services during the Statement Period (*i.e.*, \$93,608.00) and (ii) payment of \$1,129.95 for actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: May 16, 2022  
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
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Jennifer S. Feeney, Esq.  
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*Co-Counsel to the Ad Hoc Committee of  
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Litigation Claimants*

**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU06	Employment and Fee Applications	6.9	\$5,474.50
PU08	Litigation: Contest Matters, Adversary	1.1	\$1,299.00
PU09	Meetings and Communications w/ AHC	14.0	\$17,506.00
PU11	Plan & Disclosure Statement	56.0	\$69,328.50
	<b>TOTALS:</b>	<b>78.0</b>	<b>\$93,608.00</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	40.3	\$59,241.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	35.9	\$33,746.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	1.8	\$621.00
	<b>TOTAL</b>		<b>78.0</b>	<b>\$93,608.00</b>



**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

April 28, 2022  
BILL NO. 223201

For Services Rendered Through March 31, 2022:

Phase: PU06		EMPLOYMENT & FEE APPLICATIONS	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/09/22 JSF	Prepare Legal Papers Preparation of Interim Fee Application	.70	658.00
03/10/22 JSF	Prepare Legal Papers Prepare Seventh Interim Fee Application	1.80	1,692.00
03/11/22 JSF	Prepare Legal Papers Prepare Seventh Interim Fee Application	1.10	1,034.00
03/11/22 JKH	Prepare Papers Prepare fee application	.60	207.00
03/13/22 JSF	Examine Documents Review of February Time Detail	.30	282.00
03/14/22 JSF	Prepare Legal Papers Draft Interim Fee Application	.80	752.00
03/15/22 JSF	Examine Documents Review of February Monthly Fee Statement	.20	188.00

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/22 JKH	Prepare Papers Prepare draft monthly statement	.60	207.00
03/16/22 JKH	Prepare Papers Edit and finalize fee application	.30	103.50
03/16/22 JKH	Prepare Papers Finalize February statement	.20	69.00
03/17/22 JSF	Examine Documents Review of Interim Fee Application for Filing	.30	282.00
TOTAL PHASE PU06		6.90	\$5,474.50

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/17/22 JSF	Correspondence E-Mail with Gilbert Firm re: Document Production Inquiry	.20	188.00
03/23/22 JSF	Telephone Call(s) Attend Omnibus Hearing re: Continuation of Injunction and Funding Agreement	.40	376.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/29/22	Conference call(s)	.50	735.00
MLC	Conference call with insurance co-counsel		
TOTAL PHASE PU08		1.10	\$1,299.00

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Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/22	Conference call(s)	1.20	1,764.00
MLC	Conference call with AHC and co-counsel		
03/02/22	Telephone Call(s)	1.50	1,410.00
JSF	Attend via Zoom Weekly AHC Update Meeting		
03/02/22	Correspondence	.60	882.00
MLC	Correspondence with AHC leadership and co-counsel		
03/04/22	Telephone Call(s)	.70	658.00
JSF	Participate in Meeting with Working Group of States re: Settlement		
03/04/22	Telephone Call(s)	1.60	1,504.00
JSF	Attend Zoom Meeting of AHC re: Settlement Term Sheet and AHC Response		

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NEW YORK, NY 10169-0075

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/04/22 MLC	Conference call(s) AHC working group call	.80	1,176.00
03/07/22 JSF	Telephone Call(s) Attend Zoom AHC Meeting to Discuss Supplemental Settlement and AHC Position	1.20	1,128.00
03/07/22 MLC	Conference call(s) AHC meeting	1.10	1,617.00
03/09/22 MLC	Telephone Call(s) Co-counsel call with State Leadership to prepare for hearing	2.00	2,940.00
03/10/22 JSF	Telephone Call(s) Attend Call with Co-Counsel and Certain States re: Court Hearing and Next Steps	.30	282.00
03/10/22 MLC	Conference call(s) Conference call with AHC co-counsel and state leadership	.40	588.00
03/15/22 MLC	Conference call(s) Conference call with States' leadership and AHC co-counsel	.50	735.00
03/22/22 MLC	Conference call(s) Conference call with state leadership on AHC and counsel	.60	882.00

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/23/22 JSF	Telephone Call(s) Attend Weekly Update Meeting with AHC	.50	470.00
03/23/22 MLC	Conference call(s) Attended AHC meeting	.50	735.00
03/29/22 MLC	Conference call(s) Conference call with state leadership and co-counsel for AHC	.50	735.00
TOTAL PHASE PU09		14.00	\$17,506.00

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Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/22 MLC	Review Documents Review of draft motion re: mediation process	1.40	2,058.00
03/02/22 JSF	Examine Documents Review of Terms of Settlement Proposal	.40	376.00
03/03/22 JSF	Examine Documents Review of Mediator's Report and Settlement Term Sheet	1.10	1,034.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/03/22 JSF	Telephone Call(s) Attend Co-Counsel and Executive Committee Call re: Settlement Updates	.70	658.00
03/03/22 JSF	Examine Documents Review of Florida's Objection to Settlement Term Sheet	.30	282.00
03/03/22 MLC	Review Documents Review of motion to approve settlement with nine states/DC and Sacklers	1.80	2,646.00
03/03/22 MLC	Correspondence Correspondence with AHC State Leadership re: settlement	.80	1,176.00
03/03/22 MLC	Review Documents Review of summary of mediation term sheet	.90	1,323.00
03/04/22 JSF	Telephone Call(s) Participate in Status Conference re: Settlement Terms	.70	658.00
03/04/22 JSF	Examine Documents Review of Objections to Settlement Term Sheet	1.10	1,034.00
03/04/22 MLC	Review Documents Review of Florida objection and joinders	2.10	3,087.00

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/06/22 JSF	Memo Memo Summary of Supplemental Term Sheet	1.80	1,692.00
03/06/22 JSF	Examine Documents Review of Supplemental Settlement Term Sheet	1.20	1,128.00
03/06/22 MLC	Review Documents Review of draft AHC settlement objection memo	1.10	1,617.00
03/07/22 JSF	Examine Documents Review Draft of AHC Limited Objection to Supplemental Settlement	1.10	1,034.00
03/07/22 JSF	Memo Memo Summary of Supplemental Term Sheet	1.30	1,222.00
03/07/22 JSF	Memo Prepare Summary of Objections to Supplemental Term Sheet	2.40	2,256.00
03/07/22 JSF	Examine Documents Review of Additional Objections and Joinders to Term Sheet	.80	752.00
03/07/22 MLC	Telephone Call(s) Telephone call with Ken Eckstein re: hearing	.50	735.00



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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/07/22 MLC	Review Documents Reviewed and revised draft of AHC limited opposition to settlement	1.10	1,617.00
03/07/22 MLC	Revision of Documents Reviewed and revised draft of limited opposition to settlement	1.30	1,911.00
03/07/22 MLC	Review Documents Reviewed opposition filed against settlement by various parties	1.20	1,764.00
03/08/22 JSF	Memo Review and Summarize Further Objections to Settlement Term Sheet, Including AHC Objection	3.60	3,384.00
03/08/22 JSF	Examine Documents Review of Updates from Executive Committee and Counsel re: Supplemental Term Sheet and Objections in Advance of Hearing	.40	376.00
03/08/22 MLC	Correspondence Correspondence with Ken Eckstein to prepare for hearing	.60	882.00
03/08/22 MLC	Review Documents Review of and analysis of opposition by States to proposed settlement	1.60	2,352.00

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/09/22 JSF	Telephone Call(s) Participate in Zoom with Co-Counsel and Lead States re: Preparation for Hearing	1.70	1,598.00
03/09/22 JSF	Examine Documents Review of Debtor's and UCC's Responses to Objections to Supplemental Settlement with Nine	.50	470.00
03/09/22 JSF	Telephone Call(s) Attend Via Conference Hearing on Settlement Agreement with Nine (partial)	3.20	3,008.00
03/09/22 MLC	Prepare for Argument Prepared for hearing	1.70	2,499.00
03/09/22 MLC	Attendance at Court Hearing and decision	4.90	7,203.00
03/13/22 JSF	Examine Documents Review of Summary of Appellee Briefs Filed in Second Circuit	.30	282.00
03/18/22 MLC	Correspondence Correspondence with Aaron Cahn re: recent court decision	.40	588.00
03/18/22 MLC	Review Documents Review of various filings before Second Circuit	.80	1,176.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/21/22 MLC	Review Documents Review of amicus briefs filed before the Second Circuit	1.70	2,499.00
03/21/22 MLC	Review Documents Review of various opposition briefs filed before the Second Circuit	1.30	1,911.00
03/21/22 MLC	Revision of Documents Reviewed and revised draft of proposed AHC filing before the Second Circuit	1.40	2,058.00
03/22/22 MLC	Review Documents Review of comments to draft AHC brief	.30	441.00
03/22/22 JKH	Diary & Docket Review docket and calendar date for oral argument	.10	34.50
03/23/22 JSF	Examine Documents Review of Amicus Briefs in Support of Appellees	.30	282.00
03/23/22 MLC	Attendance at Court Hearing before court (by zoom)	.50	735.00
03/24/22 MLC	Review Documents Review of draft of reply in Second Circuit	1.40	2,058.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

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April 28, 2022  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/25/22 MLC	Correspondence Correspondence with co-counsel and state leadership re: mediation by debtors with various parties	.60	882.00
03/28/22 JSF	Examine Documents Review of Appellees' Briefs to Second Circuit	1.40	1,316.00
03/28/22 MLC	Review Documents Review of appellate papers filed with Second Circuit	2.20	3,234.00
TOTAL PHASE PU11		56.00	\$69,328.50
		TOTAL FOR SERVICES	\$93,608.00

**EXHIBIT D**

**Summary of Actual and Necessary Expenses**

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Litigation Services <sup>1</sup>	\$1,129.95
<b>TOTAL:</b>	<b>\$1,129.95</b>

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<sup>1</sup> These expenses were incurred in connection with the utilization of a third party vendor to assist Applicant with document discovery in the ongoing insurance litigation.

**EXHIBIT E**

**Expense Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

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April 28, 2022  
BILL NO. 223201

DISBURSEMENTS FOR YOUR ACCOUNT

Litigation Support Vendors	1,129.95
	<hr/>
TOTAL DISBURSEMENTS	1,129.95